Case 1:14-cr-00316-LO Document 9 Filed 09/26/14 Page 1 of 3 PageID# 17

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA CLERK, U.S. DISTRICT COURT ALEXANDRIA, VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 14CR316
)	G
v.)	<u>Count 1</u> : 18 U.S.C. §371
)	(Conspiracy to Commit Bribery)
TIMOTHY BEBUS,)	
)	Count 2: 18 U.S.C. §201(b)(1)(A) and (C)
Defendant.)	(Bribery of a Public Official)
)	•
)	

CRIMINAL INFORMATION

THE UNITED STATES CHARGES THAT:

COUNT 1 (Conspiracy to Commit Bribery)

From in and around December 2012 through in and around August 2013, in the Eastern District of Virginia and elsewhere, the defendant, TIMOTHY BEBUS, did knowingly and intentionally combine, conspire, confederate, and agree with Guard Official D, a U.S. government official with the United States Department of Defense, and others known and unknown to the United States to commit offenses against the United States of America, that is: to directly and indirectly corruptly give, offer, and promise a thing of value to a public official with intent to (i) influence any official act; and (ii) to induce such public official to do and omit to do an act in violation of the lawful duty of such official, all in violation of Title 18, United States Code, Section 201(b)(1)(A) and (C), in connection with the award of a marketing contract entered into by the United States, known as the National Guard Bureau's Action Sports contract. In furtherance of the conspiracy and to effect the objects and purposes thereof, BEBUS, Guard Official D, and their co-conspirators performed overt acts, including but not limited to: on or

about August 12, 2013, in Arlington, Virginia, within the Eastern District of Virginia, the defendant paid Guard Official D \$6,000 in cash as payment for awarding the Action Sports contract to the defendant's company.

(In violation of Title 18, United States Code, Section 371).

COUNT 2 (Bribery of a Public Official)

In and around August 2013, in the Eastern District of Virginia and elsewhere, the defendant, TIMOTHY BEBUS, did knowingly and intentionally, directly and indirectly, corruptly give, offer, and promise a thing of value to a public official, with intent to (i) influence an official act; and (ii) induce a public official to do an act and omit to do an act in violation of such official's duty, to wit: the defendant gave Guard Official D things of value in exchange for National Guard Bureau contracts.

(In violation of Title 18, United States Code, Section 201(b)(1)(A) and (C)).

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